

**Standard Operating Procedure for  
Certifying a Site-Specific Quality Assurance  
Project Plan Addendum**

**Rhode Island Department of  
Environmental Management**

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## 1 Applicability

This Standard Operating Procedure (SOP) applies to all Rhode Island Department of Environmental Management (RIDEM) staff, contractors, and entities preparing and certifying a site-specific Quality Assurance Project Plan Addendum (QAPP Addendum) for brownfields assessment and cleanup projects conducted with brownfields funding provided to RIDEM by the United States Environmental Protection Agency (USEPA).

## 2 Purpose

In brownfields projects utilizing funding provided by USEPA and in which the collection of samples of environmental media is conducted, a site-specific QAPP Addendum must be submitted that outlines the field and analytical scope of work for the investigation prior to the collection of the samples. In order to streamline the process of developing and implementing a work plan in a cost and time-efficient manner, this SOP specifies the process and procedures for certifying that the QAPP Addendum was prepared in accordance with the applicable specifications and guidelines.

This SOP assumes that the entity preparing the QAPP Addendum has already prepared and secured approval from RIDEM and USEPA of a Generic QAPP for projects in Rhode Island (Generic QAPP). Written approval of a Generic QAPP must be obtained from RIDEM and USEPA prior to the entity self-certifying a site-specific QAPP Addendum in accordance with this SOP.

## 3 Definitions

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### 3.1 QAPP

A QAPP describes in comprehensive detail the necessary Quality Assurance (QA) policies and Quality Control (QC) and technical activities that must be implemented to ensure the results of work performed, particularly for environmental data operations, will satisfy the stated performance criteria. QAPPs document the results of certain systematic planning processes (see Rhode Island Quality Management Plan, Section III.D). QAPPs may apply to specific projects/data operations, or to a program area responsible for a number of different specific projects/operations.

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### 3.2 Preparer

The Preparer is defined as any entity that undertakes the task of writing and self-certifying a QAPP Addendum. In practice, the Preparer is also the entity that will perform the environmental sampling activities. A Preparer is typically RIDEM staff or a contractor hired by RIDEM.



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### 3.3 Generic QAPP

A Generic QAPP applies to a single Preparer that will undertake environmental sampling contracted by RIDEM with funding provided by USEPA. The primary purpose of a Generic QAPP is to document the environmental sampling SOPs, laboratory analytical method SOPs, QA/QC policies, and practices, and data validation methodology of the Preparer and all subcontractors (i.e. analytical laboratories, drilling contractors etc.) that may become involved in the execution of a site-specific investigation. The Generic QAPP should be developed in accordance with USEPA requirements.

This SOP herein assumes that the preparer has already prepared and secured approval from RIDEM and USEPA for a Generic QAPP. Written approval of a contractor-specific Generic QAPP must be obtained from RIDEM and USEPA prior to the preparation of site-specific QAPP Addenda discussed herein. Self-certification of Generic QAPPs is not permitted.

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### 3.4 QAPP Addendum

A QAPP Addendum is a detailed project plan that applies only to a specified site to be investigated. The QAPP Addendum documents the "why" and "how" of an investigation by providing a comprehensive discussion of site history, a current conceptual site model defining contamination and migration pathways at a site, and a sampling plan designed to assess the site.

Prior to performing the investigation, the entity must have completed both of the following documents:

- Current Generic QAPP signed and approved by USEPA and RIDEM.
- Self-certified site-specific QAPP Addendum, prepared in accordance with the SOP documented herein.

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### 3.5 RIDEM Project Manager

Each site will be assigned a RIDEM Project Manager, the staff person at RIDEM that is responsible for the oversight and management of the overall project investigation. The RIDEM Project Manager will serve as the primary contact for project-specific issues and submissions regarding the investigation.

## 4 Responsibility

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### 4.1 QAPP Addendum Development

The Preparer is responsible for writing, certifying, and submitting the QAPP Addendum to the designated RIDEM Project Manager for the site. The Preparer shall coordinate with the RIDEM Project Manager to develop a conceptual scope of work that will be the basis of the QAPP Addendum.

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## 4.2 QAPP Addendum Review

Upon submission of a self-certified QAPP Addendum, RIDEM reserves the right to review the QAPP Addendum. At such time that RIDEM finds the document satisfactory, then RIDEM will issue written acceptance of the self-certified QAPP Addendum and approval to proceed. Subsequent to RIDEM acceptance, the Preparer may begin work at the site in accordance with the project timeline.

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# 5 Guidelines and Procedures

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## 5.1 Development of Investigation Scope of Work

When an investigation is planned that will require the development of a QAPP Addendum, the RIDEM Project Manager, Preparer, and other project stakeholders, including the project applicant and/or site owner, shall initially coordinate to develop a scope of work prior to commencement of QAPP Addendum preparation. The scope of work shall form the framework for the proposed investigation that will be further described in the QAPP Addendum. The investigation shall be conducted in accordance with the RIDEM *Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (Remediation Regulations)*. The purpose for the scope of work will be to provide an opportunity for the RIDEM Project Manager, Preparer, and project stakeholders to discuss, develop, and agree upon a sampling program for the investigation to be conducted.

The development of the scope of work may include meetings, workshops, and verbal communications between the RIDEM Project Manager, Preparer, and project stakeholders and may also include written drafts for review and comment by each party. The required format (verbal or formally/informally written) for the scope of work will be at the discretion of the RIDEM Project Manager. Once a scope of work is agreed upon, then preparation of the QAPP Addendum may commence.

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## 5.2 QAPP Addendum Preparation

Written approval of a Generic QAPP must be obtained from RIDEM and USEPA prior to the preparation of a site-specific QAPP Addendum discussed herein. Self-certification of Generic QAPPs is not permitted.

The party preparing a QAPP Addendum should prepare the document in accordance with the following USEPA-published guidance document:

- *Planning and Documenting Brownfields Projects, Generic Quality Assurance Project Plans and Site Specific QAPP Addenda*, USEPA Region I, March 2009.





The Preparer shall consult with the RIDEM Project Manager regarding significant changes to the project timeline or concerning other modifications to the sampling protocol presented in the QAPP Addendum. In practice, the Preparer should maintain communication with the RIDEM Project Manager regarding the status of the investigation.

## 6 References

RIDEM, *DEM Standard Operating Procedure for Developing QAPPs and SAPs*, SOP Number OD-QM-2, October 1, 2003.

RIDEM, *Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases*, DEM-DSR-01-93, February 2004.

USEPA Region 1, *Planning and Documenting Brownfields Projects, Generic Quality Assurance Project Plans and Site Specific QAPP Addenda*. Final, March 2009.

